I am opposed to dropping the Morse code test requirement for several reasons.

First and foremost, in Part I, Information and Executive Summary, paragraph 3, it appears you have been mid-lead that Morse code is unnecessary, inefficient, and a huge barrier to potential licensees. Also, in Part III, Subpart A, paragraph 19, you state, "the trend in amateur communications is to use voice and digital technologies for exchanging messages". In other words, Morse code is out-dated and irrelevant by today's standards. If that is so, then please tell me why the latest expedition to the Kure Atoll (K7C) which just ended, racked up 27,917 contacts via Morse (CW), or 53.6 percent of their total, 22,334 or 42.9% in voice (SSB), and 1,862 or 3.6% contacts in digital (RTTY) mode? The reason is simple; CW is an efficient mode of communication and still popular.

Here are a few more examples: In the 2005 ARRL DX contests, the leading stations in the multi-operator class categories accumulated the following results: the CW version had 6.574 contacts, versus the SSB (voice) version 5,269 contacts. The 2004 IARU HF Championship winners reported 2,626 contacts in CW, 2,313 contacts in SSB modes.

I am citing contest results, since they are the easiest to find accumulated totals and give a picture of how active we "hams" are with respect to mode of operation. Do you see the trend? Morse code is NOT DEAD as some may lead you to believe, nor the current "trend" as stated above. If you would like to hear how "alive" the amateur bands are with Morse, give the HF bands a listen on November 5th, starting at 4 pm, EST for the annual ARRL November Sweepstakes Contest. It runs until 10 pm Sunday night.

Secondly, why should we follow other countries and lower our standards? Doesn't the United States always try to be "the best"? We have already dumbed-down the code test to five words per minute for all HF licenses, to the dismay of many. The answers to the written exams are made public too, but that's another issue in itself. Let's remember this: it is a privilege to be a licensed amateur radio operator, not a right. Sure it takes some work to learn the code, but so does any license, whether professional or not. And five words per minute in Morse code is not exactly lightning speed.

Thirdly, dropping Morse code is analogous to eliminating teaching and testing handwriting in our schools. Why teach children how to write by hand with a pencil and paper when they can just learn to write directly onto a computer keyboard? No one hand writes letters anymore, do they? We all use our computers to write with now, don't we? In Part III, Subpart A, paragraph 17, it is stated "given that there is no requirement that a licensee who has passed a telegraphy examination actually use telegraphy for

communications...". Using that kind of logic, teaching our children to write by hand would be unnecessary, as well. Right? I certainly hope you can see the fallacy in this line of thinking.

Knowing Morse code is a fundamental tool, along with a basic understanding of electronics and radio wave theory needed to qualify as an amateur radio operator. I say fundamental tool, meaning a universal language, which crosses international borders easier than the spoken word. And isn't part of our responsibilities as amateurs to promote international goodwill? Using Morse, one can carry on a "conversation" with Antonio in Italy, who knows little spoken English, but understands the terminology and abbreviations used with Morse!

Lastly, I take issue with your statement in the Part I Summary, par. 3, that eliminating the code test would "encourage individuals who are interested in communications technology, or who are able to contribute to the advancement of the radio art, to become amateur radio operators." I have no doubt that there are many, just waiting for this proposed rule change to come into effect. However, just what kind of people are we looking for to join the amateur radio service? Apparently, this proposal is willing to say, let those in who consider a five word-per-minute Morse code exam too big of a mountain to climb. With the vast amount of radio frequency spectrum at the disposal to us radio amateurs, doesn't it make sense that to earn the right to use that spectrum, one must work a little bit?

I believe it would be a serious mistake to drop this examination requirement.

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